

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA**

DEBORAH G. MALLOW IRA SEP )  
INVESTMENT PLAN, Individually )  
and derivatively on behalf of )  
CHESAPEAKE ENERGY )  
CORPORATION, )

Plaintiffs, )

vs. )

AUBREY K. McCLENDON, )  
RICHARD K. DAVIDSON, )  
KATHLEEN M. EISBRENNER, )  
V. BURNS HARGIS, )  
FRANK KEATING, )  
CHARLES T. MAXWELL, )  
MERRILL A. MILLER, JR., )  
DON L. NICKLES, and )  
LOU SIMPSON, )

Defendants, )

--and-- )

CHESAPEAKE ENERGY )  
CORPORATION, an Oklahoma )  
Corporation, )

Nominal Defendant. )

CASE NO. CIV-12-436-M

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**JOINT MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT**

**WHEREAS**, on April 19, 2012, Plaintiff Deborah G. Mallow IRA SEP Investment Plan filed her Shareholder Direct and Derivative Complaint (the "Complaint") in the above-referenced matter;

**WHEREAS**, Plaintiff is in the process of completing service of the Complaint on the Nominal Defendant and Individual Defendants (collectively “Defendants”);

**WHEREAS**, pursuant to Federal Rule of Civil Procedure 12(a)(1)(A) the first response to the Complaint, by Defendant(s) served on April 20, 2012, was due on May 10, 2012;

**WHEREAS**, the parties have agreed to extend the time of all Defendants to respond to the Complaint until after the consolidated amended complaint is on file.

**WHEREAS**, counsel for the Defendants has agreed to accept service of the Complaint for all Defendants;

**NOW THEREFORE, IT IS STIPULATED AND AGREED** by Plaintiff and Defendants, by and through their respective counsel that Defendants should be allowed to file their response to the Complaint thirty (30) days from the date of filing of the Consolidated Amended Complaint.

**RELIEF REQUESTED**

The parties request Defendants be given thirty (30) days from the date of filing of the Consolidated Amended Complaint in which to file a coordinated response to the Complaint.

Respectfully submitted this 22<sup>nd</sup> day of May, 2012.

s/ Kenyatta R. Bethea

Kenyatta R. Bethea OBA #18650

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